

1 The Honorable Kymberly K. Evanson
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7 UNITED STATES DISTRICT COURT
8 FOR THE WESTERN DISTRICT OF WASHINGTON
9 AT SEATTLE

10 UNITED STATES OF AMERICA, *ex rel.*
11 KUSHWINDER SINGH,

12 Plaintiff,

13 v.

14 ALEDADE, INC., *et. al.*,

15 Defendants.

CASE NO. 2:21-cv-0410-KKE

16 **STIPULATED MOTION AND
17 [PROPOSED] ORDER FOR
18 EXTENSION OF THE TIME FOR
19 DEFENDANT ALEDADE, INC. TO
20 RESPOND TO THE COMPLAINT**

21 **NOTE ON MOTION CALENDAR:
22 JUNE 5, 2024**

23 Plaintiff Kushwinder Singh (“Plaintiff”) and Defendant Aledade, Inc. (“Defendant”) (collectively, “the Parties”), by and through their counsel of record, respectfully submit this Stipulation, and respectfully request that the Court enter the proposed order for an extension of time for Defendant to respond to Plaintiff’s Complaint.

24 1. On January 10, 2024, the Court unsealed the Amended Complaint against Defendant in the above-captioned action. (Dkt. No. 24).

25 2. On April 8, 2024, Defendant executed a Waiver of the Service of Summons. (Dkt. No. 27).

26 3. Defendant’s deadline to respond to Plaintiff’s Complaint is June 7, 2024.

27 4. The Parties are engaged in discussions regarding whether they may streamline and narrow the litigation.

STIPULATED MOTION AND [PROPOSED] ORDER
FOR EXTENSION OF THE TIME TO RESPOND TO COMPLAINT - 1
(No. 2:21-cv-0410-KKE)

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1 5. An extension would further judicial economy and no party will be prejudiced by an
2 extension.

3 6. The Parties jointly request a 45-day extension of Defendant's deadline to respond
4 to the Complaint to facilitate these discussions.

5 7. Accordingly, the Parties stipulate and respectfully request to extend Defendant's
6 deadline to respond to Plaintiff's Complaint to July 22, 2024. A proposed order is subjoined
7 herewith.

8 DATED this 5th day of June, 2024. I certify that this memorandum contains 173 words,
9 in compliance with the Local Civil Rules.

10 Respectfully submitted,

12 By: /s/ Stephen Teller
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26 Attorneys for Defendant Aledade, Inc.

1 ORDER
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IT IS SO ORDERED.

DATED this ____ day of _____, 2024.

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6 Judge Kymberly K. Evanson
7 United States District Judge
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STIPULATED MOTION AND [PROPOSED] ORDER
FOR EXTENSION OF THE TIME TO RESPOND TO COMPLAINT - 3
(No. 2:21-cv-0410-KKE)

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